Periodic Review of the 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Comments of

The Bay Institute

on

Export Limits

January 18, 2005



Export-related actions in addition to the 1995 WQCP

- 1995 Biological Opinion for delta smelt
- Vernalis Adaptive Management Plan (VAMP)
- Environmental Water Account/CVPIA (b)(2)

Each year, millions of fish are entrained and lost at the CVP and **SWP** Delta export facilities.

Entrainment loss data from D. Odenweller and CDFG



Current water management regimes have greatest effects in late-winter and spring on:

- San Joaquin River (Vernalis) flows
- exports
- SJR:Export ratio.



Since 1995 WQCP, delta smelt BO, and VAMP, San Joaquin River flow:Export ratio has improved during April 15 – May 15 period.



San Joaquin River flow:Export ratio before VAMP (March 15-April 14) and after VAMP (May 15-June 15) is poor and has worsened.



April 15-May 15 (VAMP)

O March 15-April 14

May 16-June 15



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Abundance of juvenile delta smelt declines when March-May exports are high.



Delta smelt abundance, Summer townet survey

Exports

In 95% of years with SJR:Export ratio > 1.0, SJ Basin Chinook salmon populations increase. Salmon populations decrease in 63% of years with SJR:Export < 1.0



Delta smelt population abundance declining.

San Joaquin Chinook salmon population at just 54% of doubling objective and **Return Ratio** declining.



<u>Recommendations</u>: Adopt more protective export limits before and after April 15-May 15. Link maximum exports to Vernalis flows.

March 15-31	Exports limited to 200% of Vernalis flow or 35% of total inflow, whichever is lower.
April 1-April 15	Exports limited to 100% of Vernalis flow or 35% of total inflow, whichever is lower.
April 15-May 15	VAMP export rates, as determined by the Hydrology Group of the San Joaquin River Technical Committee.
May 16-31	Exports limited to 100% of Vernalis flow or 35% of total inflow, whichever is lower.
June 1-15	Exports limited to 200% of Vernalis flow or 35% of total inflow, whichever is lower.

<u>Recommendation</u>: The current Inflow metric of the Export/Inflow ratio is protective of habitat and fisheries.



Recommendations:

